



# Oregon Tilth Certified Organic

---

470 Lancaster Dr. NE • Salem OR 97301 • Phone (503) 378-0690 Fax (503) 378-0809  
email: [organic@tilth.org](mailto:organic@tilth.org) web site: [www.tilth.org](http://www.tilth.org)

---

Friday, May 20<sup>th</sup>, 2005

The National Organic Standards Board  
1400 Independence Avenue SW, Room 4008 – South Building  
Washington, D.C. 20250-0001  
[NOSB.Livestock@usda.gov](mailto:NOSB.Livestock@usda.gov)

SUBJECT: NOSB Livestock Committee Recommendations for Guidance on Pasture Requirements

Dear members of the Board,

Thank you for this opportunity to comment.

A. Organic System Plan

OTCO supports this recommendation as guidance. The text presented should not be recommended to the NOP for rule change because §205.103 (a)(b) and §205.201(a) sufficiently articulate the level of detail required to be included in the Organic System Plan.

B. Temporary Confinement

OTCO supports this recommendation as guidance applicable to ruminants, provided the sentence “Lactation is not a justification for denied access to pasture for grazing or temporary confinement” is added at the end of the first paragraph for clarity.

OTCO believes the rulemaking actions recommended by the NOSB to the NOP on March 18, 2005 for “access to pasture” and “stage of production to stage of life” will, if adopted, adequately clarify that lactation is not a justification for temporary confinement. As such, OTCO does not believe the text proposed here should be recommended for rule change because it does not add significant value to the rulemaking actions already recommended. Alternatively, OTCO would support deleting §205.239 (b)(2) “The animal’s stage of production” as rule change because the animal’s stage of production is not, in and of itself, a justification for temporary confinement. Legitimate reasons for temporary confinement are sufficiently addressed in §205.239 (b)(1), (3) and (4).

C. Appropriate Pasture Conditions

OTCO supports this recommendation as guidance. It should not be recommended as a rule change. NOP defines pasture as: “Land used for livestock grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources”. Access to pasture for ruminants therefore means access to land used for ruminant grazing that is managed to provide feed value and maintain or improve soil, water, and vegetative resources. OTCO believes that the NRCS Conservation Practice Standard for

Prescribed Grazing (Code 528A) would be overly prescriptive and unrealistic in many regions of the US and the world if adopted as part of the rule.

Sincerely,

Thierry Pomerleau  
Oregon Tilth, Inc.